

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Attorney for Debtors

In Re:

Chris & Joanne Pezzano-Fillius

Debtors

Case No.: 18-19249

Chapter: 13

Judge: JN Poslusny

**OBJECTION TO MOTION FOR RELIEF FROM STAY
AS TO REGIONAL ACCEPTANCE**

We, Chris and Joanne Pezzano-Fillius, being of full age do hereby certify that:

1. We are the debtors in the above captioned matter, and as such have knowledge of the facts in this case and do hereby make the following Certification.

2. Our case was dismissed on June 5, 2018 for failure to file documents. The case was reinstated on or about July 2, 2018. We didn't make payments pending the reinstatement and we believed we were going to reaffirm the contract.

3. We don't understand how the creditor come up with the amount due \$2,223.00 and we believe it may be incorrect.

4. According to Creditor Regional Acceptance the car's value is \$6,650.00, however, our counsel used the Kelly Blue Book number and stated that the value is \$2,700.00, based on the

mileage and other variables. In any event, there is no equity in the car. That is what both the creditor and we agree upon.

5. Our counsel has reached out to the attorney for Regional Acceptance to request a postponement but as of yet has not received a response. We respectfully request an adjournment so we can discuss this issue with the creditor.

5. We certify that the foregoing statements made by us are true. We are aware that if any of the foregoing statements are willfully false that we are subject to punishment.

By: /s/Chris & Joanne Pezzano-Fillius
Debtors

Dated: August 6, 2018